

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COBB COUNTY, GEORGIA,

Plaintiff,

v.

TYLER TECHNOLOGIES, INC.,

Defendant.

Case No. 1:24-cv-00045-LMM

**JOINT MOTION TO EXTEND DEADLINE TO CONDUCT RULE 26(f)
CONFERENCE AND FILE JOINT PRELIMINARY REPORT AND
DISCOVERY PLAN**

Plaintiff, Cobb County, Georgia (“Plaintiff”), and Defendant, Tyler Technologies, Inc. (“Defendant” and, together with Plaintiff, the “Parties”), hereby file this Joint Motion to Extend the Deadline to Conduct Rule 26(f) Conference and File a Joint Preliminary Report and Discovery Plan until the Court rules on Defendant’s Motion for More Definite Statement and respectfully show the Court as follows:

1. Plaintiff filed its Complaint in the Superior Court of Cobb County on December 4, 2023, alleging Breach of Contract against Defendant.
2. Defendant filed a Notice of Removal to this Court on January 3, 2024, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

3. Defendant filed a Motion for More Definite Statement and Incorporated Brief on January 9, 2024, pursuant to Federal Rule of Civil Procedure 12(e).

4. Pursuant to L.R. 16.1, the Parties are required to conduct their Rule 26(f) Conference within sixteen (16) days of the first Defendant's Answer or Motion. Accordingly, the Parties are required to conduct their Rule 26(f) Conference on or before January 25, 2024.

5. Pursuant to L.R. 16.2, the Parties are required to file their Joint Preliminary Report and Discovery Plan within thirty (30) days of the first Defendant's Answer or Motion. Accordingly, the Parties are required to file their Joint Preliminary Report and Discovery Plan on or before February 8, 2024.

6. "The District Court has broad discretion to stay proceedings as an incident to its power to control its own docket." *Clinton v. Jones*, 520 U.S. 681, 706 (1997).

7. Given Defendant's pending Motion and Plaintiff's duty to respond to said Motion, the Parties believe delaying their Rule 26(f) Conference and filing of their Joint Preliminary Report and Discovery Plan will assist the Parties and the Court to move timely and efficiently through adjudication of the matter.

8. The Parties respectfully request that this Honorable Court grant their Joint Motion to Extend Deadline to Conduct Rule 26(f) Conference and File Joint

Preliminary Report and Discovery Plan until the Court rules on Defendant's Motion for More Definite Statement.

Respectfully submitted this 24th day of January 2024.

/s/ David R. Cook

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LR 7.1(D) CERTIFICATE OF FONT COMPLIANCE

I hereby certify that the foregoing document has been prepared with one of the font and point selections approved by the Court in Rule 5.1 (C) of the Civil Local Rules of Practice for the United States District Court for the Northern District of Georgia, specifically Times New Roman 14 pt. font.

CERTIFICATE OF SERVICE

This is to certify that the foregoing document was electronically filed this day with the Clerk of the Court through the CM/ECF system, which will send notice of electronic filing to counsel of record and that copies of the foregoing documents were served upon the Defendant via U.S. Mail, postage prepaid, at the below addresses listed:

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This 24th day of January 2024.

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